

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
	:	Case No.: 20-cv-10838 (AKH)
SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
	:	
-against-	:	<u>STIPULATION AND</u>
	:	<u>[PROPOSED] ORDER</u>
GLOBAL INVESTMENT STRATEGY UK LTD.,	:	
	:	
and	:	
	:	
JOHN WILLIAM GUNN,	:	
	:	
Defendants.	:	
_____	X	

On December 22, 2020, Plaintiff Securities and Exchange Commission (“SEC”) filed a Complaint against Defendants Global Investment Strategy UK Ltd. (“GIS”) and John William Gunn (“Mr. Gunn”). The Complaint alleges that GIS violated Section 15(a) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78o(a), and that Mr. Gunn aided and abetted GIS’s alleged violations of Section 15(a) of the Exchange Act.

The parties, through their undersigned attorneys and subject to the Court’s approval, hereby stipulate and agree to the following:

1. Plaintiff filed an affidavit of service with the Court on January 7, 2021, and the Court docket reflected that responses to the Complaint from Defendants were due on or before January 27, 2021 (Dkt. 10);

2. On January 22, 2021, the parties stipulated and moved the Court for an extension of time for Defendants to file an answer or move to dismiss to on or before February 23, 2021 (Dkt. 11);

3. On January 25, 2021, the Court granted the motion and ordered that Defendants' responses to the Complaint are due on or before February 23, 2021 (Dkt. 13);

4. With this second extension, Defendants may move, answer, or otherwise respond to the Complaint by March 12, 2021;

5. If Defendants move to dismiss the Complaint, the SEC may file an opposition on or before April 16, 2021, and Defendants may file a reply on or before May 7, 2021;

6. By entering into this Stipulation, Defendants have preserved all grounds to dismiss the Complaint including, but not limited to, personal jurisdiction and service of process.

With good cause appearing for the entry of an Order setting the response time to the Complaint for Defendants and a briefing schedule on a motion to dismiss should one be filed,

IT IS on this 12 of February 2021

ORDERED that a response to the Complaint by both of the Defendants will be due on or before March 12, 2021.

SECURITIES AND EXCHANGE
COMMISSION

/s/ David Stoelting

By: _____

David Stoelting
200 Vesey Street, Suite 400
New York, New York 10281-1022
Telephone (212) 336-0174
stoeltingd@sec.gov

DLA PIPER US LLP

/s/ Caryn Schechtman

By: _____

Caryn Schechtman
1251 Avenue of the Americas
New York, New York 10020
Telephone (212) 335-4593
Facsimile (212) 884-8593
caryn.schechtman@dlapiper.com

SO ORDERED:

DATED: New York, New York

February 12, 2021

/s/

ALVIN K. HELLERSTEIN
United States District Judge